



**DEPARTMENT OF THE NAVY**  
**COMMANDER NAVY REGION SOUTHWEST**  
937 NO. HARBOR DR.  
SAN DIEGO, CALIFORNIA 92132-0058

IN REPLY REFER TO:

5090

Ser N45JAB.jc/168

October 7, 2015

Ms. Kathleen H. Johnson  
Director, Enforcement Division  
U.S. Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, CA 94105

Dear Ms. Johnson:

On behalf of Navy Region Southwest, please find the Navy's responses to your letter dated June 30, 2015, which our office received on August 27, 2015. Our letter dated September 3, 2015 requested an additional 45 days to provide a response to your letter that requested detailed information regarding the Navy's fleet of heavy-duty diesel-fueled vehicles in California; which was confirmed in September 8, 2015 calls with your office and legal staff. Specifically, the Navy's compliance with Section 2025 of the California Code of Regulations, Title 13, Article 4.5, Chapter 1.

Response #1: All available information for each diesel-fueled vehicle in the Navy's fleet driven in California at any time from May 4, 2012, to June 30, 2015 with a Gross Vehicle Weight Rating ("GVWR") greater than 26,000 pounds and an engine model year prior to 2007 is located in the enclosed CD, within the Microsoft Excel file titled "TRUCKINFO.xlsx", in the "Older Fleet" worksheet.

Response #2: Applicable vehicles identified in response #1 that are equipped with a diesel particulate filter ("DPF") have been identified as such in the "TRUCKINFO.xlsx" spreadsheet, in the "Older Fleet" worksheet.

Response #3: For those vehicles identified as equipped with a DPF in response #2, all available information is included in the enclosed "TRUCKINFO.xlsx" spreadsheet, in the "Older Fleet" worksheet.

Response #4: For those vehicles identified as equipped with a DPF in response #2, available copies of the installation and purchase order documents are included in the enclosed CD within

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the folder, "DPF". Files are labeled using the vehicles license plate number.

Response #5: For those vehicles identified as equipped with a DPF in response #2, response to whether the vehicle has operated continuously since the installation is included in the enclosed "TRUCKINFO.xlsx" spreadsheet, in the "Older Fleet" worksheet.

Response #6: All vehicles equipped with a DPF were operated continuously as it was designed since installation.

Response #7: All diesel-fueled vehicles in the Navy's fleet driven in California at any time from May 4, 2012, to June 30, 2015; has a GVWR greater than 26,000 pounds; and has an engine model year of 2007, 2008, or 2009 are equipped with PM BACT and therefore not included in this response.

Response #8: For those vehicles identified in response #1, which are still in the active fleet (i.e., not retired), total mileage traveled in California for the periods noted is included in the enclosed "TRUCKINFO.xlsx" spreadsheet, in the "Older Fleet" worksheet. Retired vehicles are also identified in the worksheet.

Response #9: For those vehicles identified in response #1, if any truck is specified as a drayage truck is noted in the enclosed "TRUCKINFO.xlsx" spreadsheet, in the "Older Fleet" worksheet.

Response #10: The Navy does not participate nor use the International Registration Plan ("IRP") for tracking vehicles.

Response #11: For each terminal identified in the worksheet "Older Fleet", within the "TRUCKINFO.xlsx" spreadsheet, all requested information is included in the "Terminals" worksheet.

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Response #12: The Navy does not typically hire or dispatch trucks for the purpose of trucking. If and when these services are contracted out, they are done by other federal government agencies, such as Defense Logistics Agency (DLA) or the United States Transportation Command (TRANSCOM).

Response #13: Please see response to Q12.

Response #14: By far the largest and primary "leased" vehicles originate from the U.S. General Services Administration (GSA). The Navy has submitted a request to GSA for required data, however it is our stance that GSA is required to comply with the Truck and Bus Regulation, and it is a strain on Navy personnel to not only track compliance with our own fleets, but a large fleet like GSA. Therefore, GSA data has not been included in as part of the Navy response.

Response #15: Please see response to Q14.

Response #16: The Navy has been involved with the Truck and Bus Regulation since the inception and was heavily involved with the workshops and working groups leading up to the initial regulation in 2009. At that time the Navy had begun planning and programming to comply with *Table 1: Best Available Control Technology Compliance Schedule* of the 2008 version of the regulation.<sup>1</sup> With the four-year delay later approved by the Board due to the recession, the Navy was able to better program funds for replacements and/or retrofits. Since 2010 the Navy has been utilizing §2025(g) to comply with the Truck and Bus Regulation. The primary path to compliance has been upgrading to model year (MY) 2010 engines by the way of new truck procurements. In instances where procurement funds were/are not available, applicable trucks were taken out of service and/or retired. Applicable vehicles were taken out of service or retired are listed in the enclosed "TRUCKINFO.xlsx" spreadsheet, in the

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<sup>1</sup> <http://www.arb.ca.gov/regact/2008/truckbus08/revfro.pdf>

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"Older Fleet" worksheet. In rare instances when a truck is critical to operations and minimally used, the truck has been placed in the low-use category. All Navy low-use trucks are tracked and reported in ARB's Truck Regulation Upload, Compliance, and Reporting System (TRUCRS).

§2025(i) was not utilized by the Navy to comply with the Truck and Bus Regulation.

Complying with §2025(x)(2) of the Truck and Bus Regulation is the responsibility of above mentioned government agencies in response to question #12 that provide these support services to the Navy.

The Navy would like to thank you again for your patience in our response. As mentioned in our previous letter the request did not reach our offices until August 27, 2015. The Navy prides itself as an Environmental Steward and continues to work alongside USEPA, ARB and the local air districts to meet air quality standards. If you have any follow up questions to our response please contact Jose M. Casora who can be reached at (619) 532-4174.

Sincerely,



K. A. STEWART

By direction

Enclosure: 1. Truck and Bus CD  
2. Statement of Certification

Copy to: 1. Marine Corps Installations West (ACS G7)  
2. Deputy Assistant Secretary of the Navy  
(Environmental)  
3. Matt Salazar, U.S. Environmental Protection Agency

ENCLOSURE 2: Statement of Certification

[This Certification is for signature by the secretary or another agency official with authority to perform similar policy or decision-making functions of the agency.]

The U.S. Department of the Navy ("Navy") is submitting the enclosed documents in response to the U.S. Environmental Protection Agency's ("EPA") request for information, issued pursuant to Section 114(a) of the Clean Air Act, to determine whether the facility is in compliance with the Clean Air Act, including with the federally-approved California Truck and Bus Regulation.

I certify that I am fully authorized by the Navy to provide the above information on its behalf to EPA.

I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true, correct, accurate and complete. I am aware that there are significant penalties for submitting false statements and information, or omitting required statements and information, including the possibility of fines and imprisonment for knowing violations.

Date:

10/7/15

Name (Printed):

KATHRYN A. STEWART

Signature:

Ka Stewart

Title:

N45 SHORE INSTALLATION ENVIRONMENTAL PROGRAM MANAGER